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Filing date: **12/15/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91197089
Party	Plaintiff Los Angeles Dodgers LLC
Correspondence Address	DON M OBERT COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6799 UNITED STATES sis@cll.com, trademark@cll.com, jmn@cll.com, mlk@cll.com, dmo@cll.com, rsm@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Signature	/Don M. Obert/
Date	12/15/2014
Attachments	BROOKLYN BURGER; Opp. No. 91207958 Motion Suspend 12152014.pdf(9739 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 77/750,645
Filed: June 3, 2009
For Mark: BROOKLYN BURGER (Stylized)
Published in the Official Gazette: April 27, 2010

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LOS ANGELES DODGERS, LLC,

Opposer,

v.

A. STEIN MEAT PRODUCTS, INC.,

Applicant.
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Opposition No. 91197089

**MOTION ON CONSENT TO SUSPEND AND TO EXTEND
DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

The parties have, through their counsel, conducted their mandatory discovery conference on August 15, 2014, and now Opposer, with the consent of Applicant's counsel, hereby requests that the Deadline for Initial Disclosures and all remaining dates be suspended for thirty (30) days as follows to discuss settlement:

Initial Disclosures Due :	01/18/2015
Expert Disclosures Due :	05/18/2015
Discovery Period to Close :	06/17/2015
Plaintiff Pretrial Disclosures :	08/01/2015

Plaintiff's 30-day Trial Period Ends :	09/15/2015
Defendant/Counterclaim Plaintiff's Pretrial Disclosures :	09/30/2015
30-day Trial Period for Defendant and Plaintiff in the Counterclaim :	11/14/2015
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :	11/29/2015
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	01/13/2016

If the Board grants this motion, the Board should reset the trial periods and other periods as outlined above.

Dated: New York, New York
December 15, 2014

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Don M. Obert/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 15, 2014, I caused a true and correct copy of the foregoing Motion On Consent To Suspend And To Extend Discovery Period If Opposition Is Resumed to be sent via First Class Mail, postage prepaid, to Applicant's attorney and Correspondent of Record, Robert T. Maldonado, Esq., Cooper & Dunham LLP, 30 Rockefeller Plaza, New York, New York 10012.

New York, New York
Dated:
December 15, 2014

/Don M. Obert/
Don M. Obert